

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HYPERTHERM, INC., a New Hampshire
corporation,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE “A”,

Defendants.

CASE NO. 1:24-cv-5198-GNA-JC

Honorable Georgia N. Alexakis
Magistrate Judge Jeffrey Cole

**DECLARATION OF KENNETH J. DYER IN SUPPORT OF
PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT JUDGMENT**

I, Kenneth J. Dyer, hereby declare as follows:

1. I am a member in good standing of the California and Washington Bars. I have been admitted *pro hac vice* to practice law in the United States District Court for the Northern District of Illinois in this matter. [Dkt # 11, 12].
2. I am an attorney with the law firm of Workman Nydegger, representing Plaintiff Hypertherm, Inc. in the above-entitled action. I am over the age of eighteen and am competent to testify to all matters contained herein.
3. Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the following.
4. Pursuant to the Court’s Temporary Restraining Order [Dkt. 13], and on behalf of Hypertherm, I requested discovery from Amazon.com, Inc. (“Amazon”), eBay, Inc. (“eBay”) and

Walmart, Inc. (“Walmart”) via subpoena for contact and sales information of each of the defendants in Schedule A to the Complaint.

5. In response, Amazon, eBay and Walmart provided discovery regarding the contact information as well as limited sales information, including product descriptions, for the defendants. This discovery was in the form of one or more Excel spreadsheets containing similar, but not identical information from each of the aforementioned third-parties. If requested, I will provide the Court an electronic copy of these spreadsheets to review, as generally each spreadsheet has multiple tabs and/or is otherwise too large to print out.

6. I personally reviewed the information provided by Amazon, eBay and Walmart in response to the aforementioned subpoenas and have used the information to identify any products of the Defaulting Defendants that include one or more electrodes identified by part number 220842 and that infringe the Patents-in-Suit (the “Infringing Products”). A list of the Infringing Products sold and/or offered for sale by each of the Defaulting Defendants since June 21, 2018 identified by the ASIN or Item ID for those products is set forth in the table below:

Def. #	Seller Name	Amazon Seller Id	ASINs of Infringing Products
1	Kemao	A1KKJHO7HJM9WA	B0C6SLY22S B08LPBWSJK B08LDM5G68 B08LPBWQX4 B08LDK6YPZ B08LQ2YV2G B08LDLR91R B08LP99SS9 B08LP9CK5N B08LDKVPRB B08LDKP88F B08LPGV99H B08LDM3L87 B08LDN7LHW B07QXVXHSQ

			B086BH4FF1 B089K5BLP7 B089ZRW41S B08B17GBCL B08FDH7NQM B08FSTNDGX B08G8KPHT9 B0LDMC3RW B08LDNHTMS B0LDP6T7K B0SLDQMZ4J B08LDR62CV B0SLDRBC3G B08LGMQL6C
5	Lsafes	A208WRYST0QM4Q	BOCFXZ2NJ4
6	Donwind	AJTJiomCE03QY	B09P351CLD B07TV27S8X B07STQYH7K B0817GJTMP B0817CJP8G B09P2JZFD8 B09SSYXK9V B07QXVSG4Y B07QK9ZGGQ B07SWVJ7VR B07WX6S22N B07QXVXHSQ B07RHF DHLZ B07S3K57TD B07SRPTT87 B07SSPGVKB B07STR832W B07SVTTWN8 B07WT2862H B07WV7Z5W2 B07Y9DN8FH B07Y9MV3XC B07ZTH2R8B B0ZZTHM21J B0813M8GS6 B0813WBY92 B0817CZV2W B081C5T7LV

			B081C9YC84 B081CF8LK8 B085PQN31Q B085PX2H86 B0861WB76G B08671XBYZ B086BH4FF1 B086BV24SC B086BZWBX4 B09WH4MPC2 B09WH4RVCK B09WHHZDNW B0D3VH3CQV
7	Orient sunrise	A1G9WP6EATNJ6D	B0CKQQH6FZ B0CKQQH5K5 B0CKQQCZZ1 B0CKQQQYW8 B0CKQRB6ZG
10	Fast Delivery 9-16 Days	A1JKQUCGVBTY3T	B0C95PNWD6 B0C94SY42Z B0C94RR964 B0C93C75W4 B0C94NCP6X B0C94NVV3K B0C932WGCH B0C94R8B7V B0C95VG7VP B0C93SFXDX B0C94Q6PRB B0C94C6ZRT B0C932Z499 B0C94Q7R8D B0C9493LHX B0C94NXMTY B0C949SL6H B0C95R1GZP B0C93T4D9T B0C95RX8PN B0C93Q9KQR B0C95PPBHL B0C939KW8T B0C93S9CRP B0C94RVMSM B0C9468179

			B0C95T5FXK B0C9361LF5
11	JiaWang Wang	A2PU0L8ZGV7CNA	B0CFV21HJZ
12	Wangyu1234	A1QNLI02UL5GFF	B0C9SW9W19 B0CFV2B1YW B0C9T1F42M B0C9SZCMHM B0CFTZSJ3L B0CFV52PG7 B0CFV4BLDV B0C9SY3P4N B0CFV2MW5K B0C9SYLGZ5 B0CFV1RLSN B0CFV266S3 B0C9SZZ5NZ B0CFV483SY B0CFV24HR6 B0C9T33D68 B0C9T2WJDL B0C9T13KN5 B0CFV3Y2D9 B0CFV2SW1S B0C9R1BRV6 B0C9R2HP52
14	SXXZSLH	A1WN09FGVHN7EX	B0CR7Q8BRR B0CR7RWF3K
15	Lorry High Quality Shops	A38KD3REF30D0A	B0C3QGXT9 B0C36SG9KP B0C36S3V2X B0C3W57Z81 B0C36RLPDR B0C37QLBQQ B0C3WBW8W6 B0C3W8WR8M B0C3RTB52K B0C3W76YZJ B0C36QGH5T B0C37SY6H4 B0C3QJF8YV B0C3QF5687 B0C3S5VPVN B0C3W86YNK

			B0C36SWWTK B0C36RVSY1 B0C36RWL27 B0C3RVMGPC B0C37QBWPB B0C3W78FFF B0C36RSR7D B0C3W6W4K5 B0C3QGBHBN B0C3RV64L5 B0C3W5THJT B0C36SWNTG B0C3RTMH8V B0C36TKHML B0C36RBR37 B0C3W9MSDJ B0C3W4Z29V B0C3W85ZTR B0C36RBX8H B0C37QFQTM B0C3RTZQRK
17	QingDao Welding	ACZQ9L5Z4QW69	B08G8FCN4W B08G8GDDNG B07VJ1K3J5 B07VBJLX4Q B08G8KPHT9 B07VGW4JR8 B08G8GDQ47
19	H Cheng	A6YGUCZ00HZOJ	B0C6PJXYNW B0C6KKSRP1 B0C6P1LYXP B0C6KPNFT B0C6P96GNY B0C6PJFQWH B0C6M13NBQ B0C6KJM5VS B0C6P2F8GX B0C6LZCVR8 B0C6PKTHJH B0C6PCV3QR B0C6KLSGRG B0C6PQDXQ6 B0C6PJJ6JQ B0C6PY7776

			B0C6KL118G B0C6P1V74H B0C6PTSGQ7 B0C6KK6ZG9 B0C6P2R928 B0C6KQ86XP B0C6LYX52Q B0C6M1N75W B0C6P2LX4S
20	TuKeMei	A8ZJL01CG11X9	B0CJNWDHHR B0CJNW4WCM B0CJNVSQK5 B0CJNVV1MS
21	LiuYongGang	AF1ETPWIMP1O	B0BN9M8VZV
23	Jingmen Chongye	A3MBE57F1YQDNH	B0CB7YMQS5
27	WARBESON FACTORY	A2XZS2TEGFZ4IV	B0B5F8NW31 B0B5F9B3PZ B0B5F52JM9 B0B5F8M51X
28	MGER	AYGQT4AQ2N1HK	B08TH1B5JS B08TBKCPFL B098Q9SK3W B09P8BTMPY
29	Premium Department Stores	A1HP09QPADS8ZK	B0C286B62Y B0C277NRX5 B0C2H4MTYX B0C2HTM3WN B0C2GV2HGG B0C2GN5D2Y B0C2HXJR7G B0C2J1DHBX B0C287YV59 B0C2GTH7S2 B0C2GMXM5Z B0C2GR6MJF B0C2H8FLY6 B0C287KKFQ B0C279XB2M B0C1MTYGHF B0C1MZKGYB B0C2H4JRZB B0C2J15WP5

			B0C27BHYDK B0C1MXNJKS B0C279DSJ9 B0C2GX74D6 B0C2GTM69P B0C288T7Y8 B0C2H4C5W9 B0C1N1MLFP B0C1MXN9MK
30	Jack&Dave	A1GE06MXPL4SLF	B0B1C1PXY4 B0B1C277D6 B0B1C2B7DC B0B1C4GJMG B0B1C2BH9X B09TL96M41 B0B1DKM27Z B0B1CB8HBS B09TL9XNPB B0B2M2QFLJ B0B1DL4919 B0B1C3Z8GY B09TL86L55 B0B1C2NLKG B09TL6NMSX B0B1D99ZZD B0B1PYYS1H B0B1PY95GS B0B1C3XP74 B09TL6Z2F6 B0B1C43JZB B0B1C29ZNF B0B1PXLW97 B0B1PYLKK9 B0B1C41D17 B0B1C42TF4 B0B1C3FNJ1 B0B1C4CPLT B0B1DDZQYS B09TL84GC9 B09TL7QJNQ B0B1C3R4DK B0B1C1W12K B09TL839SS B09TL724W7

			B09TL7W2JM B0B1D9FMVG B0B1C272Y7 B0B1DKWV52 B0B1C4FMQK B0B1D9STVC B0B1C4QQKV B0B1DMH5JR B0B1CFNCND B0B1DPHKWQ
Def. #	Seller Name	EBay Seller Id	Item IDs of Infringing Products
33	Automaster-Land	2463473591	404473582350
34	Autostartup	2465729597	204428985115
35	KEMAO	2002583359	403722972571 401963881453 402135913184 402359409894 402512775784 402523889986 402597130273 402619753112 402629578468 403188237279 403617032607 403722596176 404899705202
40	pneumatic-welded	2565441095	364656756774 364671369685
Def. #	Seller Name	Walmart Seller Id	Item IDs of Infringing Products
50	zhehao	101121244	1732489713

7. I also used the information provided by Amazon, eBay and Walmart to calculate the number of individual electrodes with part number 220842 (“Infringing 220842 Electrodes”) that were sold by each of the Defaulting Defendants. Each Infringing Product comprises at least one (1), and usually ten (10) or more, individual Infringing 220842 Electrodes. I performed this calculation by: (a) identifying all the Infringing Products sold by the Defaulting Defendants; (b)

identifying how many of each Infringing Product was sold by the relevant Defaulting Defendant; (c) using the product description of the Infringing Product to determine how many individual electrodes were included with each Infringing Product; (d) multiplying the quantities determined in steps (b) and (c) for each Infringing Product for each Defaulting Defendant; and (e) for each Defaulting Defendant, summing the totals calculated in step (d). A table reflecting the above calculations for each of the Defaulting Defendants and identifying the number of Infringing 220842 Electrodes sold by each Defaulting Defendant since June 21, 2018 is set forth below:

Def. #	Seller Name	ASINs of Infringing Products	# of ASIN Sold	# of 220842 in ASIN	# of 220842 Sold	Total # of 220842 Electrodes Sold by Defendant
1	Kemao	B0C6SLY22S	0	20	0	77,190
		B08LPBWSJK	292	20	5840	
		B08LDM5G68	9	10	90	
		B08LPBWQX4	563	20	11260	
		B08LDK6YPZ	6	10	60	
		B08LQ2YV2G	532	20	10640	
		B08LDLR91R	113	10	1130	
		B08LP99SS9	18	10	180	
		B08LP9CK5N	875	20	17500	
		B08LDKVPRB	8	10	80	
		B08LDKP88F	26	20	520	
		B08LPGV99H	574	20	11480	
		B08LDM3L87	421	40	16840	
		B08LDN7LHW	16	10	160	
		B07QXVXHSQ	21	10	210	
		B086BH4FF1	4	40	160	
		B089K5BLP7	2	40	80	
		B089ZRW41S	1	10	10	
		B08B17GBCL	24	10	240	
		B08FDH7NQM	6	20	120	
		B08FSTNDGX	4	50	200	

		B08G8KPHT9	5	20	100	
		B0LDMC3RW	4	5	20	
		B08LDNHTMS	2	5	10	
		B0LDP6T7K	1	5	5	
		B0SLDQMZ4J	1	5	5	
		B08LDR62CV	8	5	40	
		B0SLDRBC3G	3	5	15	
		B08LGMQL6C	39	5	195	
5	Lsafes	BOCFXZ2NJ4	0		0	0
6	Donwind	B09P351CLD	566	20	11320	413,150
		B07TV27S8X	2228	20	44560	
		B07STQYH7K	1789	10	17890	
		B0817GJTMP	890	10	8900	
		B0817CJP8G	729	10	7290	
		B09P2JZFD8	437	20	8740	
		B09SSYXK9V	1993	40	79720	
		B07QXVSG4Y	3061	10	30610	
		B07QK9ZGGQ	11293	10	112930	
		B07SWVJ7VR	2101	10	21010	
		B07WX6S22N	886	20	17720	
		B07QXVXHSQ	2736	10	27360	
		B07RHFDHLZ	108	5	540	
		B07S3K57TD	12	10	120	
		B07SRPTT87	3	10	30	
		B07SSPGVKB	3	10	30	
		B07STR832W	94	10	940	
		B07SVTTWN8	5	10	50	
		B07WT2862H	21	20	420	

		B07WV7Z5W2	72	20	1440	
		B07Y9DN8FH	3	20	60	
		B07Y9MV3XC	13	40	520	
		B07ZTH2R8B	1	20	20	
		B0ZZTHM21J	2	10	20	
		B0813M8GS6	3	20	60	
		B0813WBY92	3	10	30	
		B0817CZV2W	6	10	60	
		B081C5T7LV	1	10	10	
		B081C9YC84	1	10	10	
		B081CF8LK8	1	10	10	
		B085PQN31Q	2	10	20	
		B085PX2H86	1	10	10	
		B0861WB76G	3	20	60	
		B08671XBYZ	2	20	40	
		B086BH4FF1	495	40	19800	
		B086BV24SC	1	10	10	
		B086BZWBX4	3	10	30	
		B09WH4MPC2	24	10	240	
		B09WH4RVCK	24	10	240	
		B09WHHZDNW	1	10	10	
		B0D3VH3CQV	27	10	270	
7	Orient sunrise	B0CKQQH6FZ B0CKQQHSK5 B0CKQQCZZ1 B0CKQQQYW8 B0CKQRB6ZG	0		0	0
10		B0C9361LF5	1	5	5	5

	Fast Delivery 9-16 Days	B0C95PNWD6 B0C94SY42Z B0C94RR964 B0C93C75W4 B0C94NCP6X B0C94NVV3K B0C932WGCH B0C94R8B7V B0C95VG7VP B0C93SFXDX B0C94Q6PRB B0C94C6ZRT B0C932Z499 B0C94Q7R8D B0C9493LHX B0C94NXMTY B0C949SL6H B0C95R1GZP B0C93T4D9T B0C95RX8PN B0C93Q9KQR B0C95PPBHL B0C939KW8T B0C93S9CRP B0C94RVMSM B0C9468179 B0C95T5FXX B0C9361LF5	0		0	
11	JiaWang Wang	B0CFV21HJZ	1	20	20	20
12	Wangyu1 234	B0C9SW9W19 B0CFV2B1YW B0C9T1F42M B0C9SZCMHM B0CFTZSJ3L B0CFV52PG7 B0CFV4BLDV B0C9SY3P4N B0CFV2MW5K B0C9SYLGZ5 B0CFV1RLSN B0CFV266S3 B0C9SZZ5NZ B0CFV483SY	0		0	0

		B0CFV24HR6 B0C9T33D68 B0C9T2WJDL B0C9T13KN5 B0CFV3Y2D9 B0CFV2SW1S B0C9R1BRV6 B0C9R2HP52				
14	SXXZSL H	B0CR7RWF3K	1	20	20	20
		B0CR7Q8BRR	0		0	
15	Lorry High Quality Shops	B0C3RTZQRK	1	5	5	5
		B0C3QGXJT9 B0C36SG9KP B0C36S3V2X B0C3W57Z81 B0C36RLPDR B0C37QLBQQ B0C3WBW8W6 B0C3W8WR8M B0C3RTB52K B0C3W76YZJ B0C36QGH5T B0C37SY6H4 B0C3QJF8YV B0C3QF5687 B0C3S5VPVN B0C3W86YNK B0C36SWWTK B0C36RVSY1 B0C36RWL27 B0C3RVMGPC B0C37QBWPB B0C3W78FFF B0C36RSR7D B0C3W6W4K5 B0C3QGBHBN B0C3RV64L5 B0C3W5THJT B0C36SWNTG B0C3RTMH8V B0C36TKHML	0		0	

		B0C36RBR37 B0C3W9MSDJ B0C3W4Z29V B0C3W85ZTR B0C36RBX8H B0C37QFQTM				
17	QingDao Welding	B08G8FCN4W	128	20	2560	13,255
		B08G8GDDNG	95	20	1900	
		B07VJ1K3J5	12	25	300	
		B07VBJLX4Q	1	25	25	
		B08G8KPHT9	223	20	4460	
		B07VGW4JR8	6	5	30	
		B08G8GDQ47	199	20	3980	
19	H Cheng	B0C6P2LX4S	1	5	5	5
		B0C6PJXYNW B0C6KKSRP1 B0C6P1LYXP B0C6KPBNFT B0C6P96GNY B0C6PJFQWH B0C6M13NBQ B0C6KJM5VS B0C6P2F8GX B0C6LZCVR8 B0C6PKTHJH B0C6PCV3QR B0C6KLSGRG B0C6PQDXQ6 B0C6PJJ6JQ B0C6PY7776 B0C6KL118G B0C6P1V74H B0C6PTSGQ7 B0C6KK6ZG9 B0C6P2R928 B0C6KQ86XP B0C6LYX52Q B0C6M1N75W	0		0	

20	TuKeMei	B0CJNVV1MS	1	10	10	10
		B0CJNWDHHR B0CJNW4WCM B0CJNVSQK5	0		0	
21	LiuYong Gang	B0BN9M8VZV	0		0	0
23	Jingmen Chongye	B0CB7YMQS5	36	10	360	360
27	WARBE SON FACTOR Y	B0B5F8NW31	15	20	300	1,140
		B0B5F9B3PZ	9	20	180	
		B0B5F52JM9	10	20	200	
		B0B5F8M51X	23	20	460	
28	MGER	B08TH1B5JS	2250	20	45000	45,870
		B08TBKCPFL	20	20	400	
		B098Q9SK3W	19	10	190	
		B09P8BTMPY	28	10	280	
29	Premium Departme nt Stores	B0C1MXN9MK	1	20	20	20
		B0C286B62Y B0C277NRX5 B0C2H4MTYX B0C2HTM3WN B0C2GV2HGG B0C2GN5D2Y B0C2HXJR7G B0C2J1DHBX B0C287YV59 B0C2GTH7S2 B0C2GMXM5Z B0C2GR6MJF B0C2H8FLY6 B0C287KKFQ B0C279XB2M B0C1MTYGHF B0C1MZKGYB B0C2H4JRZB B0C2J15WP5 B0C27BHYDK	0		0	

		B0C1MXNJKS B0C279DSJ9 B0C2GX74D6 B0C2GTM69P B0C288T7Y8 B0C2H4C5W9 B0C1N1MLFP				
30	Jack&Dave	B0B1C1PXY4	45	20	900	34,730
		B0B1C277D6	49	20	980	
		B0B1C2B7DC	29	20	580	
		B0B1C4GJMG	77	20	1540	
		B0B1C2BH9X	6	20	120	
		B09TL96M41	100	20	2000	
		B0B1DKM27Z	41	20	820	
		B0B1CB8HBS	51	20	1020	
		B09TL9XNPB	24	20	480	
		B0B2M2QFLJ	151	20	3020	
		B0B1DL4919	33	20	660	
		B0B1C3Z8GY	37	20	740	
		B09TL86L55	37	20	740	
		B0B1C2NLKG	22	20	440	
		B09TL6NMSX	97	20	1940	
		B0B1D99ZZD	24	20	480	
		B0B1PYYS1H	42	7	294	
		B0B1PY95GS	25	7	175	
		B0B1C3XP74	53	20	1060	
		B09TL6Z2F6	279	20	5580	
		B0B1C43JZB	11	20	220	
		B0B1C29ZNF	83	20	1660	

		B0B1PXLW97	7	20	140	
		B0B1PYLKK9	21	7	147	
		B0B1C41D17	10	20	200	
		B0B1C42TF4	8	20	160	
		B0B1C3FNJ1	7	20	140	
		B0B1C4CPLT	52	20	1040	
		B0B1DDZQYS	25	20	500	
		B09TL84GC9	19	20	380	
		B09TL7QJNQ	81	20	1620	
		B0B1C3R4DK	24	20	480	
		B0B1C1W12K	54	20	1080	
		B09TL839SS	14	20	280	
		B09TL724W7	19	20	380	
		B09TL7W2JM	10	20	200	
		B0B1D9FMVG	26	20	520	
		B0B1C272Y7	18	5	90	
		B0B1DKWV52	44	20	880	
		B0B1C4FMQK	19	20	380	
		B0B1D9STVC	11	20	220	
		B0B1C4QQKV	7	20	140	
		B0B1DMH5JR	7	20	140	
		B0B1CFNCND	6	4	24	
		B0B1DPHKWQ	7	20	140	
Def. #	Seller Name	Item IDs of Infringing Products	# of Item ID Sold	# of 220842 in Item ID	# of 220842 Sold	Total # of 220842 Electrodes Sold by Defendant
33	Automaster-Land	404473582350	14	20	280	280

34	Autostart up	204428985115	4	20	80	80
35	KEMAO	403722972571	873	20	17,460	32,360
		401963881453	5	50	250	
		402135913184	5	50	250	
		402359409894	11	10	110	
		402512775784	3	10	30	
		402523889986	2	50	100	
		402597130273	1	40	40	
		402619753112	9	50	450	
		402629578468	117	40	4,680	
		403188237279	30	20	600	
		403617032607	105	40	4,200	
		403722596176	177	20	3,540	
		404899705202	23	40	920	
40	pneumati c-welded	364656756774	1	20	20	120
		364671369685	5	20	100	
Def. #	Seller Name	Item IDs of Infringing Products	# of Item ID Sold	# of 220842 in Item ID	# of 220842 Sold	Total # of 220842 Electrodes Sold by Defendant
50	zhehao	1732489713	0		0	0

8. I also used the information to identify and calculate, for each of the Defaulting Defendants: (a) the total revenue generated through the sale of Infringing Products; and (b) the total amount of funds restrained in the Defaulting Defendants known financial accounts as of the time of the most recent discovery information received from Amazon, eBay and Walmart. The table below summarizes this information for each of the Defaulting Defendants:

Def. #	Seller Name	Amazon Seller Id	Total Revenue	Restrained Funds
1	Kemao	A1KKJHO7HJM9WA	\$304,365.65	\$74,076.61
5	Lsafes	A208WRYST0QM4Q	\$0.00	\$0.00
6	Donwind	AJTJiomCE03QY	\$1,931,339.60	\$18,157.94
7	Orient sunrise	A1G9WP6EATNJ6D	\$0.00	\$885.46
10	Fast Delivery 9-16 Days	A1JKQUCGVBTY3T	\$21.60	\$570.10
11	JiaWang Wang	A2PU0L8ZGV7CNA	\$109.99	\$177.49
12	Wangyu1234	A1QNLI02UL5GFF	\$0.00	\$569.03
14	SXXZSLH	A1WN09FGVHN7EX	\$98.83	\$115.34
15	Lorry High Quality Shops	A38KD3REF30D0A	\$22.46	\$677.52
17	QingDao Welding	ACZQ9L5Z4QW69	\$70,415.60	\$2,761.80
19	H Cheng	A6YGUCZ00HZOJ	\$21.60	\$266.01
20	TuKeMei	A8ZJL01CG11X9	\$34.28	\$174.52
21	LiuYongGang	AF1ETPWIMP1O	\$0.00	\$175.65
23	Jingmen Chongye	A3MBE57F1YQDNH	\$1,050.07	\$124.69
27	WARBESON FACTORY	A2XZS2TEGFZ4IV	\$3,451.26	\$738.65
28	MGER	AYGQT4AQ2N1HK	\$192,650.65	\$0.00
29	Premium Department Stores	A1HP09QPADS8ZK	\$58.08	\$40.11
30	Jack&Dave	A1GE06MXPL4SLF	\$179,831.26	\$680.32
Def. #	Seller Name	EBay Seller Id	Total Revenue	Restrained Funds
33	Automaster-Land	2463473591	\$497.78	\$17.53
34	Autostartup	2465729597	\$150.06	\$2.95
35	KEMAO	2002583359	\$68,615.98	\$321.27
40	pneumatic-welded	2565441095	\$383.75	\$394.01

Def. #	Seller Name	Walmart Seller Id	Total Revenue	Restrained Funds
50	zhehao	101121244	0	-\$17.52

9. I attest that the information in each of the tables above is an accurate and true summary of the information provided in discovery by Amazon, eBay and Walmart with regard to the Defaulting Defendants.

10. Based on the above information, the total revenue generated by the Defaulting Defendants from the sales of Infringing Products is at least \$2,753,118.50.

11. Based on the above information a total of at least 618,890 Infringing 220842 Electrodes have been sold by the Defaulting Defendants.

12. Based on the above information the amount restrained in Defaulting Defendants' known financial accounts ranges from -\$17.52 to \$74,076.61.

13. Based on the above information the total amount restrained in Defaulting Defendants' known financial accounts is \$100,909.48.

14. I understand from information provided in the Declaration of Brett Hansen in Support of Motion for Default Judgment that: (a) the average price charged by Hypertherm to its channel partners for each Genuine 220842 Electrode is seven dollars and eighty-eight cents (\$7.88); and (b) the cost of manufacturing each Genuine 220842 Electrode (including labor, equipment and materials) at Hypertherm's manufacturing facility in Lebanon, New Hampshire is two dollars and thirty cents (\$2.30).

15. Accordingly, based on the average sales price and cost of each Genuine 220842 Electrode, the profit lost by Hypertherm for each sale of an Infringing 220842 Electrode is five dollars and fifty-eight cents (\$5.58).

16. Based on the information set forth above regarding the total number of Infringing 220842 Electrodes sold by each of the Defaulting Defendants and lost profit of \$5.58 for each sale of an Infringing 220842 Electrode, I have calculated and set forth in the table below the total lost profits suffered by Hypertherm with respect to each of the Defaulting Defendants:

Def. #	Seller Name	Amazon Seller Id	# Infringing 220842 Electrodes Sold	Damages
1	Kemao	A1KKJHO7HJM9WA	77,190	\$430,720.20
5	Lsafes	A208WRYST0QM4Q	0	\$0.00
6	Donwind	AJTJiomCE03QY	413,150	\$2,305,377
7	Orient sunrise	A1G9WP6EATNJ6D	0	\$0.00
10	Fast Delivery 9-16 Days	A1JKQUCGVBty3T	5	\$27.90
11	JiaWang Wang	A2PU0L8ZGV7CNA	20	\$111.60
12	Wangyu1234	A1QNLI02UL5GFF	0	\$0.00
14	SXXZSLH	A1WN09FGVHN7EX	20	\$111.60
15	Lorry High Quality Shops	A38KD3REF30D0A	5	\$27.90
17	QingDao Welding	ACZQ9L5Z4QW69	13,255	\$73,962.90
19	H Cheng	A6YGUCZ00HZOJ	5	\$27.90
20	TuKeMei	A8ZJL01CG11X9	10	\$55.80
21	LiuYongGang	AF1ETPWIMP1O	0	\$0.00
23	Jingmen Chongye	A3MBE57F1YQDNH	360	\$2,008.80
27	WARBESON FACTORY	A2XZS2TEGFZ4IV	1,140	\$6,361.20
28	MGER	AYGQT4AQ2N1HK	45,870	\$255,954.60
29	Premium Department Stores	A1HP09QPADS8ZK	20	\$111.60
30	Jack&Dave	A1GE06MXPL4SLF	34,730	\$193,793.40

Def. #	Seller Name	EBay Seller Id	# Infringing 220842 Electrodes Sold	Damages
33	Automaster-Land	2463473591	280	\$1,562.40
34	Autostartup	2465729597	80	\$446.40
35	KEMAO	2002583359	32,630	\$182,075.40
40	pneumatic-welded	2565441095	120	\$669.60
Def. #	Seller Name	Walmart Seller Id	# Infringing 220842 Electrodes Sold	Damages
50	zhehao	101121244	0	\$0.00

17. Based on limited financial information provided by Amazon and eBay with respect to the Defaulting Defendants, Hypertherm served subpoenas on the banks identified below with respect to the Defaulting Defendants identified below and requested that the accounts for the Defaulting Defendants be frozen in accordance with the Court's TRO [Dkt. 13] and Preliminary Injunction [Dkt. 31]:

Def. #	Seller Name	Amazon Seller Id	Bank Name	Name on Account
1	Kemao	A1KKJHO7HJM9WA	JPMorgan Chase Bank NA	Jiangsu Kemao Automation Co., Ltd.
1	Kemao	A1KKJHO7HJM9WA	CITIBANK N.A.	Jiangsu Kemao Automation Co., Ltd.
6	Donwind	AJTJiomCE03QY	First Century Bank, NA	zhangyang wu
17	QingDao Welding	ACZQ9L5Z4QW69	CITIBANK N.A.	QingDaoJinHeZhiMeiGongYiPinMaoYiYouXianGongSi
28	MGER	AYGQT4AQ2N1HK	JPMorgan Chase Bank NA	ruianshi tepeng maoyi youxiangongsi

30	Jack&Dave	A1GE06MXPL4SLF	Community Federal Savings Bank	Taizhou Lonke E- commerce Co.
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18. The identified banks have not to date been able to identify specific accounts for any of the Defaulting Defendants based on the information provided by Amazon and eBay and thus no U.S. bank accounts associated with any of the Defaulting Defendants have yet been frozen and Hypertherm has no knowledge regarding the available funds in any of those accounts.

19. I declare under penalties of perjury under the United States that the statements set forth herein are true and correct to the best of my knowledge and understanding.

DATED this 15th day of October, 2024.

/s/ Kenneth J. Dyer

Kenneth J. Dyer